



**Terry Tamminen**  
Agency Secretary

# Air Resources Board

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**Alan C. Lloyd, Ph.D.**  
**Chairman**

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**Arnold Schwarzenegger**  
Governor

April 13, 2004

Mr. Wayne Nastri  
Regional Administrator  
Region 9  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, California 94105

Dear Mr. Nastri:

The Air Resources Board (ARB) requests that the U.S. Environmental Protection Agency (U.S. EPA) initiate parallel processing of proposed revisions to the Ventura County Air Pollution Control District (District) portion of the California State Implementation Plan (SIP) for the federal one-hour ozone standard. This revision essentially recalibrates the motor vehicle portion of the emissions inventory, within the federally-approved rate-of-progress and attainment demonstrations, based on extensive updates to vehicle activity and emissions. Although Ventura County is a severe-15 ozone nonattainment area with an attainment date of 2005, the region has already achieved the standard since the year 2000.

The purpose of this revision is to incorporate the latest motor vehicle emission estimates in the transportation conformity budgets used to determine whether transportation plans and programs are consistent with air quality goals. The Southern California Association of Governments is the Metropolitan Planning Organization for much of the southern part of the State, including Ventura County. To avoid any delays in transportation funding for the region, U.S. EPA needs to find the conformity budgets adequate and the federal transportation agencies need to approve a new conformity determination before the existing conformity determination for the SCAG region expires on June 8, 2004.

Under parallel processing procedures, we request that upon receipt of this letter, U.S. EPA initiate the public comment period for the budget adequacy process via website posting on U.S. EPA's adequacy review website. We ask that you act to find the proposed conformity budgets adequate once the 30-day comment period is complete and the adopted SIP revision is formally submitted. The District Board will consider adoption of the Plan at a public hearing on April 13, 2004; ARB is prepared to expedite its action and the submittal to U.S. EPA.

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.*

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California Environmental Protection Agency

Key features of the proposed Ventura County 2004 Plan revision include:

1. Updates of on-road motor vehicle emissions for historical and future years to reflect current data, including the latest planning assumptions. These new emissions substitute for the on-road vehicle estimates contained in the attainment and progress demonstrations of the approved 1994/1995 Ventura SIP.
2. Revised transportation conformity emission budgets for 2005, which reflect additional, adopted vehicle emission control regulations that are not included in the existing SIP and budgets.
3. Monitoring data showing sustained ozone air quality improvement in the County and attainment of the federal one-hour ozone standard during the period from 2000 through 2003.
4. Continued benefits from the motor vehicle control program through 2005 that will reduce emissions below the levels that contributed to attainment from 2000-2003. The region's ozone monitoring record, combined with these additional reductions, demonstrate that the updated motor vehicle inventory in this submittal meets applicable federal requirements for attainment and progress.

For informational purposes, ARB staff also compared the rate of change in emissions from all sources between the 1990 base year and the 2005 attainment year using today's estimates versus the approved Ventura SIP. The comprehensive emission inventory developed for point, areawide, and mobile sources as part of the Southern California Ozone Study shows that Ventura County emissions are being controlled at a slightly higher rate than projected in the modeled attainment demonstration approved by U.S. EPA as part of the 1994/1995 Ventura SIP.

Enclosures This package consists of the following documents:

1. Proposed Ventura County 2004 Air Quality Management Plan Revision, March, 2004
2. Appendix A-2004, Reactive Organic Emission Reductions from Measures Adopted/Revised After December 1, 1996
3. Appendix O-2004, On-Road Motor Vehicle Emission Inventory Documentation

These materials can be found on the Ventura County District's website at <http://www.vcapcd.org/pubs/Planning/2004AQMPRevision.pdf>. The ARB website at <http://www.arb.ca.gov/planning/sip/vcsip04/vcsip04.htm> includes further details on the motor vehicle emissions inventory and transportation conformity budgets.

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To ensure that any future updates to these budgets are used expeditiously in the conformity process, we request that U.S. EPA allow the proposed budgets to be replaced upon a finding of adequacy. To accomplish this, we ask U.S. EPA to limit its approval of the new budgets to last only until the effective date of future U.S. EPA adequacy findings for replacement budgets.

If you have any questions, please call Ms. Lynn Terry, Deputy Executive Officer, at (916) 322-2739, or have your staff contact Ms. Cynthia Marvin, Chief, Air Quality and Transportation Planning Branch, at (916) 322-7236.

Sincerely,

*/s/ LMT for CEW*

Catherine Witherspoon  
Executive Officer

Enclosures

cc: See next page.

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cc: (Without Enclosures)

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